

Merrifield, VA 22116

Attn: Chemical Right-to-Know Program

Proposed Test Plan for Hydroxymethanesulfonic Acid, Monosodium Salt (CAS# 870-72-4)

Dear Administrator Whitman:

The Sodium Formaldehyde Bisulfite Manufacturers Association (SFBMA) in association with the Synthetic Organic Chemical Manufacturers Association (SOCMA) and composed of DanChem Technologies, Incorporated (formally Hickson DanChem Corporation), Eastman Kodak Company, Fuji Hunt Photographic Chemicals, Inc., and Konica Graphic Imaging International, Inc. volunteered on April 25, 2001, to sponsor hydroxymethanesulfonic acid, monosodium salt (CAS# 870-72-4), also known as sodium formaldehyde bisulfite, as part of the HPV Challenge Program.

SFBMA planned to review pertinent databases and the scientific literature, assemble and review existing data and studies, and submit a test plan in the year 2003. After an extensive search of company files and these sources, no useful data that would meet the scientific requirements of a SIDS endpoint could be identified. The only information found was in a few company material safety data sheets (MSDSs), RTECs, and the **MERCK Index** that contained nothing more than estimates of a few physicochemical properties.

The search included the scientific literature and the following data the National Library of Medicine databases, the Hazardous Substances Data Bank (HSDB), the EPA Integrated Risk Information System (IRIS), the EPA Genetic Toxicity (GENE-TOX) database, the National Cancer Institute (NCI) Chemical Carcinogenesis Research Information System (CCRIS), the Multiple Toxicity Databases, TOXLINE, the Developmental and Reproductive Toxicology and Environmental Teratology Information Center (DRT/ETIC) database, the EPA Toxics Release Inventory (TRI), and ChemID^{plus}. In addition, SFBMA employed a subscription service called NERAC (www.nerac.com) which provides a staff person with relevant training

to conduct the searches after conferring with the client.

Further evidence that very little data exists for this chemical was provided by a National Institutes of Health (NIH) NCI Division of Cancer Biology scientific search and summary report sent to SFBMA by Dr. David G. Longfellow, Chief, Chemical and Physical Carcinogenesis Branch. The cover letter dated March 19, 2001 and the summary were also sent to Mr. Charles M. Auer of your staff. It is not surprising that very little data exists for this innocuous photographic chemical since it has been safely produced and used since the 1800's.

In light of the fact that none of the SIDS endpoints required for the EPA HPV Challenge Program can be completed, the SFBMA test plan is to do ALL the required tests and studies. These studies will be done under Good Laboratory Practices (GLPs) and cover the required areas of physicochemical properties, environmental fate and pathways, ecotoxicity, and environmental toxicity.

If you or your staff have any questions or comments regarding our test plan, please feel free to contact me.

Sincerely,

Edward Kordoski, MBA, Ph.D.

Executive Director